

August 24, 1988

TO: Holland Shepherd, Reclamation Soils Specialist
FROM: D. Wayne Hedberg, Reclamation Hydrologist *DWH*
RE: Review Comments, Uintah County Asphalt Ridge Mine NOI, M/047/022,
Uintah County, Utah

The following comments should be incorporated into your draft letter dated August 10, 1988 regarding Uintah County's Asphalt Ridge Mine NOI. The plan, although somewhat hard to follow, is probably the best effort we can expect from the county. I feel they have made an honest effort to comply with our permitting requirements and are sincere in their commitment to reclaim the mine site. Given the history of the operation, I do not believe there is much more we can ask them to do with this site. I concur with your decision to proceed with tentative approval of the application.

After walking the mine site area, I do not have significant concerns regarding the surface hydrology. The site exhibits no obvious signs of excessive erosion even though the local ephemeral drainages have historically been intercepted or blocked by the mining activities. This is probably a good indicator as to whether one might expect problems during continued operations and/or upon final reclamation of the mine site. So long as the major surface drainages intercepted by the mining operation are reestablished to the extent practicable upon final reclamation, I have no problems with this proposal. I also do not believe that it is likely that any groundwater impacts will occur as a result of this mining operation.

Page 38 - Reclamation Plan, Area R-5, pits:

Upon cessation of mining operations, Uintah County proposes to construct a berm near the southern boundary of the mined out pit area. This plan is intended to keep disturbed area runoff from affecting Asphalt Ridge Operating Company's (AROC) adjacent mining operation. This proposal is acceptable only as a temporary solution to control surface runoff from this portion of the mine site.

Upon final reclamation, Uintah County, AROC and/or other responsible party, must reestablish a stable surface drainage configuration for the pit areas that will, to the extent practicable, blend into and conform with the surrounding topographic constraints. The Division suggests that the county and AROC work out a reasonable proposal before this mining application is approved. Otherwise, this requirement will be a condition to our approval of the mining application and ultimate release of both operator's final reclamation obligations.

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Page 13 & 14 - Requests for Variance, M-10(3) Impoundments, M-10(5) Highwalls, M-10(8) Roads & Pads, M-10(14) Soils:

The Division hereby grants the variance requests under the provisions as outlined in the application and according to the following conditions:

INSERT SPECIFIC CONDITIONS HERE (as per Holland's letter).

Page 14, M-10(14) Soils:

Holland I'm uncertain if the variance request on salvaging topsoil and subsoils is meant to apply to any future expansion (i.e., R-4 area)? We may want to limit this variance to those areas previously disturbed and to outcrops and excessively steep terrain where removal would be impractical. Your call on this one?

Note: Holland, we may need to identify how we will handle the variance request on page 14, regarding relief from the bonding requirement of Rule R613-005-112?

Page 23 - Mining Plan, Alternative #2 & #3:

The proposed core drill holes may need to be processed under a separate notice of intention to commence exploration. This is not necessary if the exploration is to be conducted as developmental drilling and is approved as part of the original notice of intention to commence large mining operations. If the core drilling results prove favorable, then the original application must be amended to include the appropriate alternative mining proposal.

This concludes my review comments on this mining application.

dwh/jb
cc: L. Braxton
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